

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

JEROME CORSI,

Plaintiff,

v.

**ROBERT MUELLER, individually and in
his official capacity as Special Counsel,
FEDERAL BUREAU OF
INVESTIGATION, NATIONAL
SECURITY AGENCY, CENTRAL
INTELLIGENCE AGENCY, UNITED
STATES DEPARTMENT OF JUSTICE,
JEFF BEZOS, THE WASHINGTON
POST, and MANUEL ROIG-FRANZIA,**

Defendants.

Civil Action No. 1:18-cv-2885-ESH

**CONSENT MOTION FOR EXTENSION OF TIME
FOR DEFENDANTS TO ANSWER OR OTHERWISE RESPOND TO COMPLAINT**

Defendants WP Company LLC d/b/a The Washington Post (the “Post”), Manuel Roig-Franzia and Jeff Bezos, (collectively, “Defendants”), by their undersigned counsel, respectfully move this Court for an extension of time for them to answer or otherwise respond to the Amended Complaint filed by Jerome Corsi to and including May 14, 2019. Defendants’ counsel has conferred with Plaintiffs’ counsel pursuant to Local Rule 7(m), and Plaintiffs’ counsel has consented to this request.

On January 21, 2019, Plaintiff filed an Amended Complaint, adding the Defendants as parties. The Court issued a summons as to the Defendants on March 26, 2019. *See* ECF No. 24. Plaintiff served the summons and Amended Complaint on the Post on April 9, 2019, and on Mr. Roig-Franzia on April 11, 2019. On April 22, 2019, Plaintiff attempted service on Mr. Bezos by delivering a copy of the summons and Amended Complaint to the headquarters of Amazon.com,

Inc. in Seattle, Washington. On April 23, 2019, without conceding that service on Mr. Bezos was valid, undersigned counsel for Defendants notified Plaintiff's counsel that we would accept service on Mr. Bezos's behalf.

Under the Federal Rules of Civil Procedure, the date for the Defendants to answer or otherwise respond to the Complaint would be April 30, 2019 for the Post; May 2, 2019 for Mr. Roig-Franzia; and May 14, 2019 for Mr. Bezos.

When undersigned counsel for the Defendants contacted Plaintiff's counsel to seek consent for this Motion, he stated that Plaintiff intends to file a motion for leave to file a second amended complaint. Filing a new, Second Amended Complaint would render the first Amended Complaint moot and reset any deadlines for the Defendants to respond. He asked Defendants' consent for his anticipated motion for leave, and we stated that we do so consent. We understand that Plaintiff will be filing that motion this week.

Nevertheless, out of an abundance of caution in light of the pending deadlines for responding to the Amended Complaint, Defendants seek the extension of the deadline for all Defendants to answer or respond to the Amended Complaint to May 14, 2019, which would be the due date for the last-served Defendant, Mr. Bezos, to answer or respond. Plaintiff consents to this request.

This is the Defendants' first request for an enlargement of time. There are no other deadlines in this case that will be affected by this extension.

WHEREFORE, Defendants respectfully request that the Court grant their motion, and that the deadline for Defendants to answer or otherwise respond to the first Amended Complaint be extended to and including May 14, 2019.

Dated: April 29, 2019

Respectfully submitted,

/s/ Laura R. Handman

Laura R. Handman (DC Bar No. 444386)

Eric J. Feder (DC Bar No. 1048522; admission to this Court pending)

Davis Wright Tremaine LLP

1919 Pennsylvania Avenue N.W., Suite 800

Washington, DC 20006-3401

(202) 973-4200

(202) 973-4499 (fax)

laurahandman@dwt.com

ericfeder@dwt.com

Attorneys for Defendants WP Company LLC

d/b/a The Washington Post, Manuel Roig-

Franzia, and Jeff Bezos

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

JEROME CORSI,

Plaintiff,

v.

**ROBERT MUELLER, individually and in
his official capacity as Special Counsel,
FEDERAL BUREAU OF
INVESTIGATION, NATIONAL
SECURITY AGENCY, CENTRAL
INTELLIGENCE AGENCY, UNITED
STATES DEPARTMENT OF JUSTICE,
JEFF BEZOS, THE WASHINGTON
POST, and MANUEL ROIG-FRANZIA,**

Defendants.

Civil Action No. 1:18-cv-2885-ESH

PROPOSED ORDER

Upon consideration of the Consent Motion for Extension of Time to Answer or Otherwise Respond to the Complaint filed herewith by Defendants WP Company LLC d/b/a The Washington Post, Manuel Roig-Franzia, and Jeff Bezos (“Defendants”), it is

ORDERED that Defendants’ motion is granted, and that the deadline for the Defendants to answer or otherwise respond to the Complaint is extended to May 14, 2019.

Dated this ____ day of _____, 2019.

Hon. Ellen S. Huvelle
United States District Judge

CERTIFICATE OF SERVICE

This is to certify that I have this 29th day of April, 2019, electronically filed the foregoing Consent Motion for Extension of Time to Answer or Otherwise Respond to the Complaint using the CM/ECF system and served upon counsel of record by electronic filing.

/s/ Laura R. Handman

Laura R. Handman